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substantively consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and the
consolidated Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

THE ESTATE OF MARK D. MADOFF and
ANDREW H. MADOFF, individually and as Executor
of the Estate of Mark D. Madoff,

Adv. Pro. No. 09-01503 (SMB)

Defendants.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

MADOFF TECHNOLOGIES LLC, MADOFF
BROKERAGE & TRADING TECHNOLOGY, LLC,
PRIMEX HOLDINGS, LLC, ESTATE OF MARK D.
MADOFF, and ANDREW MADOFF, individually
and in his capacity as Executor of the ESTATE OF
MARK D. MADOFF,

Defendants.

Adv. Pro. No. 10-03483 (SMB)

**CERTIFICATE OF NO OBJECTION OF TRUSTEE'S MOTION FOR ENTRY OF AN
ORDER PURSUANT TO SECTION 105(a) OF THE BANKRUPTCY CODE AND
RULES 2002 AND 9019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
APPROVING A STIPULATION BY AND BETWEEN THE TRUSTEE, THE UNITED
STATES GOVERNMENT, AND THE SETTLING DEFENDANTS IN THE ABOVE-
CAPTIONED PROCEEDINGS**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated SIPA
Liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) and the consolidated
Chapter 7 Estate of Bernard L. Madoff (“Madoff,” and together with BLMIS, collectively, the
“Debtors”), by and through his undersigned counsel, submits this certificate pursuant to Local
Bankruptcy Rule 9075-2, and respectfully represents:

1. On June 26, 2017, the Trustee filed the Motion for Entry of an Order Pursuant to
Section 105(a) of the Bankruptcy Code and Rules 2002 and 9019 of the Federal Rules of
Bankruptcy Procedure Approving a Stipulation by and between the Trustee, the United States
Government, and the Settling Defendants in the above-captioned proceedings (the “Motion”)
(ECF No. 303, 118).¹

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

2. The deadline for filing objections to the Motion expired on July 19, 2017 at 4:00 p.m. A hearing on the Motion has been scheduled for July 26, 2017 at 10:00 a.m.

3. Notice of Motion was provided by U.S. Mail, postage prepaid or email to (i) defendants in these adversary proceedings; (ii) all parties included in the Master Service List as defined in the Order Establishing Notice Procedures (ECF No. 4560); (iii) all parties that have filed a notice of appearance in these cases; (iv) the SEC; (v) the IRS; (vi) the Acting United States Attorney for the Southern District of New York; and (vii) SIPC, pursuant to the Order Establishing Notice Procedures (ECF No. 4560).

4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection and, to date, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Motion.

5. An electronic copy of the proposed order (the "Order"), that is substantially in the form of the proposed order that was annexed to the Motion will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Respectfully submitted,

Dated: July 21, 2017
New York, New York

BAKER & HOSTETLER LLP

By: /s/ David J. Sheehan

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*Special Counsel for Irving H. Picard, Trustee for the
substantively consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and the
consolidated Chapter 7 Estate of Bernard L. Madoff
with respect to the Madoff Technologies LLC
Adversary Proceeding*